

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 5:18-227-SLP
	)	
JOSEPH MALDONADO-PASSAGE,	)	
a/k/a Joseph Allen Maldonado	)	
a/k/a Joseph Allen Schreibvogel	)	
a/k/a "Joe Exotic,"	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE FOR CONVENTIONAL FILING**

Defendant, JOSEPH MALDONADO-PASSAGE, by and through the undersigned counsel respectfully seeks leave to conventionally file a thumb drive containing video and audio recording exhibits associated with the Defendant's Motion for New Trial and in support thereof states as follows:

1. The Defendant expects to file a Motion for New Trial on Thursday, February 10, 2022.
2. Exhibits to the motion contain transcripts of phone calls that were turned over to post-conviction counsel; however, the recordings themselves cannot be uploaded to the docket via PACER. New video evidence is also referenced in the motion and cannot be uploaded to the docket via PACER.
3. Defendant seeks to conventionally file a thumb drive containing the video and audio recording exhibits.

4. The thumb drive will be conventionally served on all parties at the time of filing.

WHEREFORE, Defendant respectfully requests this Court enter an Order granting Defendants Motion for Leave to Conventionally File a thumb drive containing exhibits associated with the Motion for New Trial and any other relief this Court deems necessary and just.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 8, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF and a copy hereof has been furnished to those registered participants of the ECF system.

/s/ John M. Phillips

John M. Phillips

Florida Bar No.:0477575

/s/ Amy M. Hanna

Amy M. Hanna

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